

Honorable Richard C. Andrews
United States District Judge
J. Caleb Boggs Federal Building 844 N. King Street
Unit 9, Room 6325
Wilmington, DE 19801-3555

Re: GLD PARTNERS, LP, GLD SPONSOR MEMBER, LLC V. SAGALIAM ACQUISITION CORP
1:23-CV-01266 RGA

Your Honor:

I received notice of the in-person hearing for Friday, November 17, 2023 at 3:00 p.m. in Wilmington, DE. My husband had surgery yesterday in Irving, Texas at Baylor Scott & White Surgical Center on Los Colinas Ridge, in Irving, Texas and is still admitted. I ordinarily would be flying out of Houston, but this makes it where I would be flying out of DFW. There are no flights to Delaware today or tomorrow. None. I had it explained to me I need to fly to Philadelphia and catch a train. That's fine. Unfortunately, the last flight out to come back to Dallas is at 4:00 p.m. I find all of this overwhelming, but I will do it if I have to do so. I have no idea how my 73 year old husband with cardiovascular issue will get home from the hospital if I have to leave. He is not allowed to drive for 6 weeks post-op.

I am actively attempting to obtain Delaware Counsel. The attorney that I have always used in Delaware has a previously scheduled commitment and is not available until the week after Thanksgiving. I respectfully request the Court reschedule until that time.

I cannot represent the corporation *pro se* so I am not sure if I have any standing to even speak at the hearing. Because of the circumstances, I request that the Court please allow me to attend by Zoom or telephonically if the matter cannot be rescheduled. The CEO of the Corporation, its only officer, is an Orthodox Jew and cannot attend a hearing out of state so late in the day on Friday. He is located in New York and in order to be observant Mr. Kostiner would need to be home in New York by 4:30 on Friday. He will not violate his religious practices, which I respect. I will do whatever the Court instructs if I can make it work. If the Court, in its discretion, chooses to conduct this hearing without defendant present and decides to grant the TRO, I respectfully request the Plaintiff be required to post a surety bond of not less than ten million dollars (\$10,000,000) pursuant to Rule 65. This is a very modest sum compared to the damages that can result if this TRO is granted.

Sincerely,



Kelli Austin, TTEE
BN Holdings Trust
Owner Sagaliam Sponsor, LLC
Sponsor of Sagaliam Acquisition Corp (the publicly traded SPAC)

